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BAY AREA AIR QUALITY MANAGEMENT DISTRICT

DYNEGY MOSS LANDING, L.L.C PO BOX 690 MOSS LANDING CA 95039 831-633-6700

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March 24, 2017

Director of Compliance and Enforcement Bay Area Air Quality Management District 375 Beale Street San Francisco, CA 94105

Attn: Title V Reports

Oakland Power Plant Semiannual Monitoring Report, Site #B1887

Dear Sir / Madam,

Pursuant to Condition I.F. of Major Facility Review Permit Number B1887, the Dynegy Oakland, LLC (**DO**) encloses its semiannual monitoring compliance report for the Oakland Power Plant, covering the period **September 1, 2016** to **February 28, 2017**.

If you have any questions regarding this report, please call Mr. Duke Collins, Dynegy Environmental Staff, at (831) 633-6738.

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Sincerely.

REX A. LEWIS

Managing Director

Moss Landing and Oakland Power Plants

A Lew

DTCollins/dc

Enclosure: (6 pages)

cc: Luis Medina, Oakland Power Plant

File OK 401.40.02

As required by Permit Condition I.F, the following table summarizes the compliance with the monitoring requirements of Tables VII - A, VII - B and VII - C.

Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
NOx	BAAQMD 9- 9-302.2	42 ppmv, dry @ 15% O <sub>2</sub>	BAAQMD condition #2571, part 12b	P/D	water-to-fuel monitoring	The water-to-fuel ratio is checked daily when operating and adjusted, if necessary, to meet the ≥ 60% and ≤ 75% limit of permit condition #2571, part 8.
	BAAQMD 9- 9-302.2	42 ppmv, dry @ 15% O <sub>2</sub>	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See Note 1, Table I.
	BAAQMD condition #2571, part 3a	75 ppmv, dry @ 15% O <sub>2</sub> , 3-hr average	BAAQMD condition #2571, part 12b	С	water-to-fuel monitoring	The water-to-fuel ratio is checked daily when operating and adjusted, if necessary, to meet the ≥ 60% and ≤ 75% limit of permit condition #2571, part 8.
	BAAQMD condition #2571, part 3a	75 ppmv, dry @ 15% O <sub>2</sub> , 3-hr average	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See Note 1, Table I.
	BAAQMD condition #2571, part 3b	42 ppmv, dry @ 15% O <sub>2</sub> , except for startup and shutdown	BAAQMD condition #2571, part 12b	P/H	water-to-fuel monitoring	The water-to-fuel ratio is checked daily when operating and adjusted, if necessary, to meet the ≥ 60% and ≤ 75% limit of permit condition #2571, part 8.
	BAAQMD condition #2571, part 3b	42 ppmv, dry @ 15% O <sub>2</sub> , except for startup and shutdown	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See Note 1, Table I.
	BAAQMD condition #2571, part 16	Nitrogen content of fuel < 500 ppm by weight	BAAQMD condition #2571, part 9	P/E	fuel analysis or certification	Each shipment of fuel received had nitrogen content less than 500 ppm by weight

#### **Monitory Frequency Codes:**

 $(P) - periodic \qquad (C) - continuous \qquad (A) - annual \qquad (Q) - quarterly \qquad (M) - monthly \qquad (W) - weekly \qquad (D) - daily$ 

<sup>\*</sup> As stated in Tables VII - A, VII - B and VII - C of the permit.

Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
SO <sub>2</sub>	BAAQMD 9- 1-301	GLC 0.5 ppm (3 min average) 0.25 ppm (60 min average) 0.05 ppm (24 hr average)		N		n/a
	BAAQMD 9- 1-304	Sulfur content of fuel < 0.5% by weight	BAAQMD condition #2571, part 9	P/E	fuel analysis or certification	Each shipment of fuel received had sulfur content less than 0.10% by weight.
	BAAQMD condition #2571, part 4	Sulfur content of fuel < 0.3% by weight	BAAQMD condition #2571, part 9	P/E	fuel analysis or certification	Each shipment of fuel received had sulfur content less than 0.10% by weight.
Opacity	SIP Regulation 6-301	Ringelmann No. 1 for no more than 3 min/hr	BAAQMD condition #2571, part 11	P/every 400 hours of operation	visible emissions check	The operator checks for visible emission at each day time turbine start up. Startups occurred more frequently than every 400 hours.
	BAAQMD 6- 1-301	Ringelmann No. 1 for no more than 3 min/hr	BAAQMD condition #2571, part 11	P/every 400 hours of operation	visible emissions check	The operator checks for visible emission at each day time turbine start up. Startups occurred more frequently than every 400 hours.
FP	SIP Regulation 6-310	0.15 grain/dscf		N		n/a
	BAAQMD 6- 310	0.15 grain/dscf		N		n/a
NMOC	BAAQMD condition #2571, part 5	< 40 lb/hr for all turbines combined	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See Note 1, Table I.

#### **Monitory Frequency Codes:**

 $(P) - periodic \qquad (C) - continuous \qquad (A) - annual \qquad (Q) - quarterly \qquad (M) - monthly \qquad (W) - weekly \qquad (D) - daily$ 

<sup>\*</sup> As stated in Tables VII - A, VII - B and VII - C of the permit.

Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
FP	SIP Regulation 6-310	0.15 grain/dscf		N		n/a
	BAAQMD 6- 310	0.15 grain/dscf		N		n/a
NMOC	BAAQMD condition #2571, part 5	< 40 lb/hr for all turbines combined	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See note 1.
Lead	BAAQMD 11-1-301	15 lb/day		N		n/a
	BAAQMD 11-1-302	GLC not to exceed 1.0 ug/cm, 24 hr. avg.		N		n/a
Hours of operation	BAAQMD 9- 9-302	< 877 hr/per 12- month period for each turbine	BAAQMD 9- 9-502	P/E	records	Each turbine operated less than 877 hours per 12-month period as shown in Table II, Note 2.
	BAAQMD condition #2571, part 6	< 5000 hr/yr for all turbines combined	BAAQMD condition #2571, part 12	P/E	records	The total operating hours for the calendar year of 2016 were 300.4 hours. The total operating hours for the year 2017 as of 02/28/17 are 0.0 hours.
Water to Fuel Ratio	BAAQMD condition #2571, part 8	60% to 75% by volume	BAAQMD condition #2571, part 12b	D	Fuel and Water Meter	The ratio of water to fuel is check and logged at least daily when a turbine runs for at least 1 hour.

Table VII B Source-9: Wipe Cleaning								
Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary		
VOC	BAAQMD condition #5974, part 1	< 20 gal/yr	BAAQMD condition #5974, part 2	P/D	records	No solvent wipe cleaning occurred during this report period.		

#### **Monitory Frequency Codes:**

 $\text{(P)} - \text{periodic} \qquad \text{(C)} - \text{continuous} \qquad \text{(A)} - \text{annual} \qquad \text{(Q)} - \text{quarterly} \qquad \text{(M)} - \text{monthly} \qquad \text{(W)} - \text{weekly} \qquad \text{(D)} - \text{daily}$ 

<sup>\*</sup> As stated in Tables VII - A, VII - B and VII - C of the permit.

Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
Opacity	SIP Regulation 6-303	Ringelmann No. 2 for no more than 3 min/hr		N		n/a
	BAAQMD 6- 1-303	Ringelmann No. 2 for no more than 3 min/hr		N		n/a
FP	SIP Regulation 6-310	0.15 gr/dscf		N		n/a
	BAAQMD 6- 1-310	0.15 gr/dscf		N	,	n/a
SO <sub>2</sub>	BAAQMD 9- 1-301	Ground Level Concentrations: 0.5 ppm for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours		N		n/a
	BAAQMD 9- 1-304	Fuel Sulfur Limit 0.5%	BAAQMD Regulation 9- 1-502	N		n/a
Hours of Operation	BAAQMD 9- 8-330	50 hours in a calendar year	BAAQMD 9- 8-530	P/each time fuel is added	records	The emergency standby diesel engine operated 15.2 hours for reliability-related activities in 2016
	Condition 22820, part 1	20 hours in a calendar year	Condition 22820, part 3	С	Totalizing hour meter	The emergency standby diesel engine operated 15.2 hours for reliability-related activities in 2016

### Monitory Frequency Codes:

(P) – periodic	(C) – continuous	(A) – annual	(Q) – quarterly	(M) – monthly	(W) – weekly	(D) – dail

 $<sup>^{\</sup>star}$  As stated in Tables VII – A, VII - B and VII - C of the permit.

### **Notes:**

1. Table I below shows compliance with the source test requirements.

TABLE I
Source Test Compliance Information for the last Renewal Permit – Issued 10/24/12

Turbine Engine	Date of Last Applicable Source Test	Total Hours of operation since the last applicable source test.	Less than or equal to the first 877 hours after the issuance of the Renewal Permit or 2 years after the renewal Permit (October 24, 2012)? (yes/no)	Each Turbine less than 2,000 hours of operation since the last source test? (yes/no)
			Condition 2571, Part 16	Condition 2571, Part 10
1A	10/07/14	217.3	Yes - complies	Yes – complies
1B	10/07/14	205.2	Yes – complies	Yes – complies
2A	10/08/14	252.9	Yes – complies	Yes – complies
2B	10/08/14	328.4	Yes – complies	Yes – complies
3A	10/09/14	207.7	Yes – complies	Yes – complies
3B	10/09/14	314.5	Yes – complies	Yes – complies

<sup>\*</sup> As stated in Tables VII - A, VII - B and VII - C of the permit.

2. Table II below shows compliance with 877 hours operating hours per 12-month period limit.

TABLE II
Operating Hours Rolling 12-Month Compliance Information

	Turbine	Turbine	Turbine	Turbine	Turbine	Turbine
	Engine	Engine	Engine	Engine	Engine	Engine
	1A	1B	2A	2B	3A	3B
	Rolling	Rolling	Rolling	Rolling	Rolling	Rolling
	12-Month	12-Month	12-Month	12-Month	12-Month	12-Month
	Operating	Operating	Operating	Operating	Operating	Operating
	Hours	Hours	Hours	Hours	Hours	Hours
March 2016	158.5	133.4	211.1	251.6	135.1	185.6
April 2016	149.0	124.0	193.4	210.6	134.8	189.0
May 2016	150.8	125.7	148.2	141.6	112.3	137.0
June 2016	128.5	93.0	136.5	128.4	58.2	71.9
July 2016	114.1	95.6	136.5	128.3	54.1	67.7
August 2016	100.4	82.1	132.6	124.1	51.2	64.4
September 2016	69.7	42.1	127.7	119.0	43.4	61.4
October 2016	51.2	34.2	68.2	72.9	41.7	59.7
November 2016	44.1	28.0	65.6	66.7	24.2	41.3
December 2016	32.5	25.1	47.6	79.6	42.1	73.5
January 2017	20.8	23.1	47.6	79.2	42.1	73.5
February 2017	20.8	23.1	47.6	78.8	42.1	73.5

<sup>\*</sup> As stated in Tables VII - A, VII - B and VII - C of the permit.